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April 5, 2025

Via E-mail

The Honorable Analisa Torres,
United States District Court for the
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312

Re: *United States v. Guo, et al.*,
No. 23 Cr. 118 (AT) (S.D.N.Y.)

Dear Judge Torres:

I represent petitioners (1) *Mercantile Global Holdings, Inc.* and (2) *James R. Collins, Jr.*, on behalf of the following shareholders of *Mercantile Global Holdings stock*: *Morpheus Asset Strategies LLC*; *Galaxy Digital Ventures LLC*; *Options Technology Solutions International LLC d/b/a Mercury Digital Assets*; *BTG Trading Ltd.*, *Dave Chen*; *Thomas Becker*; *International Sports LLC*; *Robert Doyle*; *Arturo Ganteaume*; *Jeremy Cunningham*; *Jeff Lee*; *Eric Edwards*; *Brittany Hickman*; *Myla Johnson*; *Mirstar, LLC*; *Don Cornwell*; *Netonis Wybensing*; *Kevin Long*; and *Yarot Lafontaine*, (collectively, the “Petitioners”) with respect to the two Ancillary Petitions filed on April 5, 2025 by each party. See ECF Nos. 616 and 617.

On behalf of Petitioners and in accordance with Rule IV.A.ii of Your Honor’s Individual Practices in Civil Cases, I request that the Court permit the filing under seal of Exhibits 1 through 4 of the Ancillary Petitions filed on behalf of the Petitioners, *i.e.* ECF Nos. 616 and 617. These exhibits contain sensitive personal information for the shareholders as well as other sensitive business information not relevant to these proceedings. Filing the exhibits under seal will protect the substantial privacy interests of the 19 individual shareholders listed above and *Mercantile Global Holdings, Inc.*’s commercially sensitive business information, and the public interest would not be served by the disclosure of this information, which, again, is unrelated to the issues in Petitioners’ Ancillary Petitions.

The Honorable Analisa Torres,

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For the foregoing reasons, Petitioners respectfully ask the Court for permission to file Exhibits 1-4 of ECF Nos. 616 and 617 under seal.

Respectfully submitted,

/s/ Sharon Cohen Levin

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cc: All parties of record (by ECF)